

1 COOLEY LLP
2 MICHAEL G. RHODES (116127) (rhodesmg@cooley.com)
3 JEFFREY M. GUTKIN (216083) (jgutkin@cooley.com)
4 KYLE C. WONG (224021) (kwong@cooley.com)
5 AUDREY J. MOTT-SMITH (300550) (amottsmith@cooley.com)
6 3 Embarcadero Center, 20th Floor
7 San Francisco, CA 94111-4004
8 Telephone: (415) 693-2000
9 Facsimile: (415) 693-2222
10 Attorneys for Defendant
11 GOOGLE LLC

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 ADTRADER, INC., CLASSIC AND FOOD
16 EOOD, LML CONSULT LTD., AD
17 CRUNCH LTD., and SPECIALIZED
18 COLLECTIONS BUREAU, INC., on behalf
19 of themselves and all others similarly
20 situated,

21 Plaintiffs,

22 v.

23 GOOGLE LLC,

24 Defendant.

Case No. 5:17-cv-07082 (BLF)

**JOINT STATUS REPORT AND [PROPOSED]
ORDER FOR PRELIMINARY APPROVAL
HEARING SCHEDULE IN RESPONSE TO
COURT ORDER FOLLOWING NOTICE OF
SETTLEMENT**

Pursuant to this Court's Order on March 1, 2022 vacating all pending dates and setting a status conference for Thursday, April 28, 2022 regarding Plaintiff Specialized Collections Bureau, Inc.'s ("SCB's") forthcoming motion for preliminary approval of a class action settlement (ECF No. 379) ("Order"), the parties submit the following joint status report and proposed schedule for a hearing on Plaintiff's motion for preliminary approval.

The parties are currently finalizing the terms of the Class Action Settlement Agreement (the "Settlement") that would settle all claims on behalf of the certified AdWords class, and SCB is finalizing its forthcoming motion for preliminary approval of that Settlement. The parties expect they will finalize the Settlement, and SCB will file its motion for preliminary approval, on or about April 28, 2022, the date this Court set to hold a conference regarding the status of the class action settlement. Google does not currently anticipate that it will file a response to Plaintiff's motion for preliminary approval, such that a full briefing schedule in connection with SCB's motion is unnecessary. In light of the above, the parties jointly request that the Court convene a hearing on Plaintiff's motion for preliminary approval of class action settlement on the earliest possible date that is convenient for the Court.

IT IS SO STIPULATED.

Dated: April 21, 2022

COOLEY LLP

/s/ Audrey J. Mott-Smith

Audrey J. Mott-Smith
Attorneys for Defendant
GOOGLE LLC

Dated: April 21, 2022

GAW | POE LLP

/s/ Randolph Gaw

Randolph Gaw
Attorneys for Plaintiffs
AdTrader, Inc. et al.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3 Dated: _____

4
5
6 THE HONORABLE BETH LABSON FREEMAN
7 UNITED STATES DISTRICT JUDGE
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Audrey J. Mott-Smith, attest that concurrence in the filing of this document has been obtained from the other signatory. Executed on April 21, 2022 in San Francisco, California.

/s/ Audrey J. Mott-Smith
Audrey J. Mott-Smith

267858319